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*Attorneys for Plaintiffs AC Media Group, LLC  
and Creel Printing & Publishing Co., Inc.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

AC MEDIA GROUP, LLC, a Nevada limited liability corporation; and CREEL PRINTING & PUBLISHING CO., INC., a Nevada corporation;

Plaintiffs,

v.

SPROCKET MEDIA INC., a foreign corporation; and KYLE H. WALKENHORST, an individual,

Defendants.

Case No. 2:16-cv-02145-APG-GWF

**STIPULATION REGARDING  
ATTORNEYS' EYES ONLY  
DESIGNATION**

Plaintiffs AC Media Group, LLC, and Creel Printing & Publishing Co., Inc. (collectively "Plaintiffs") and Defendants Sprocket Media Inc. and Kyle H. Walkehorst (collectively "Defendants"), by and through their undersigned counsel, hereby stipulate and agree to produce documents with a provisional "Attorneys' Eyes Only" designation while the parties work to determine whether an "Attorneys' Eyes Only" provision needs to be included in the stipulated confidentiality agreement and protective order.

Plaintiffs served Defendants with their First Set of Requests for Production of Documents on October 17, 2016. During a telephonic meet and confer, Defendants' counsel indicated to Plaintiffs' counsel that Defendants were withholding documents and would produce responsive

documents with an “Attorneys’ Eyes Only” designation once the parties reached an agreement and the Court entered a Stipulated Protective Order and Confidentiality Agreement. The parties disagree as to the necessity of an “Attorneys’ Eyes Only” designation. Therefore,

**IT IS HEREBY STIPULATED** by and between the parties that Defendants will produce documents responsive to Plaintiffs’ requests for production with a provisional “Attorneys’ Eyes Only” designation, and may do so by any reasonable means, including but not limited to indicating “AEO” on the document identifier stamp (Bates stamp).

**IT IS FURTHER STIPULATED** that Plaintiffs’ counsel will honor the provisional “Attorneys’ Eyes Only” designation, in its customary and usual meaning, and will not disclose documents bearing this designation.

**IT IS FURTHER STIPULATED** that after Plaintiffs’ counsel has reviewed the documents bearing the provisional “Attorneys’ Eyes Only” designation, the parties will meet and confer to discuss the necessity for an “Attorneys’ Eyes Only” designation. If the parties cannot reach an agreement, the party seeking “Attorneys’ Eyes Only” protection will move the Court for appropriate protection. The party opposing the “Attorneys’ Eyes Only” protection will not disclose the provisionally protected documents until the Court has ruled on the matter.

DATED this 15<sup>th</sup> day of February 2017.

DATED this 15<sup>th</sup> day of February 2017.

SNELL & WILMER L.L.P.

FOLEY BEZEK BEHLE & CURTIS, LLP

By: /s/ Michael Paretti

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**SO ORDERED** this 16th day of February, 2017.

  
UNITED STATES MAGISTRATE JUDGE

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